

REMARKS

Applicants respectfully request reconsideration of the present application based on the foregoing amendments and the following remarks. By this amendment, claim 37 has been amended to address an informality, and claims 1, 20 and 39 have been amended merely to incorporate subject matter from herewith-cancelled claims 3, 22 and 41 and claims 4-6, 19, 23-25, 37-38, 40, 45 and 50 have been amended for consistency with amended claims 1, 20 and 39. Accordingly, no new issues are raised and/or issues have been reduced for Appeal, and so entry of this amendment is respectfully requested. Upon entry of the amendment, claims 1-2, 4-8, 10-16, 18-21, 23-27, 29-35, 37-40, 43 and 45-51 will remain pending in the application.

Claim Rejections Under 35 U.S.C. § 112 (Second Paragraph)

The Office Action rejects claims 2, 21 and 40 as allegedly failing to particularly point out and distinctly claim the subject matter of the present invention. Specifically, the rejections are directed to the term "identify certain of the plurality of network elements." Applicants respectfully disagree that the language used fails to meet the requirements of the second paragraph of 35 U.S.C. § 112. The phrase in question is written in a form that conforms to common claiming conventions and normal, everyday usage of the language. The phrase is clearly understood as meaning "identify certain network elements of the plurality of network elements." Applicants respectfully submit that the claim as phrased clearly expresses the meaning of the clause unambiguously and facilitates comprehension through reduced complexity. Such abbreviation is commonplace and can be found in common usage such as "one of the nuts in that box," that would be otherwise phrased as "one nut of the nuts in that box" and "some of those bolts," meaning "some bolts of those bolts." Applicants would be willing to amend the affected claims to reflect the clear meaning of the term. But because the present language of the claims 2, 21 and 40 clearly point out and distinctly claim the subject matter of the invention, Applicants respectfully request withdrawal of the rejections.

Claim Rejections Under 35 U.S.C. § 103(a)

Claims 1-2, 4-6, 20-21, 23-25, 37, 39, 40 and 45 stand rejected under 35 U.S.C. § 103(a) as being obvious over U.S. Patent No. 6,167,517 to Gilchrist ("Gilchrist") in view of U.S. Patent

No. 6,157,707 to Baulier ("Baulier '707"). Claims 3, 19, 22, 38 and 41 stand rejected as being obvious over Gilchrist and Baulier '707 and further in view of U.S. Patent No. 6,415,277 to Klatt et al. ("Klatt"). Claims 7, 8, 26, 27, 42 and 43 stand rejected as being obvious over Gilchrist in view of U.S. Patent No. 6,163,604 to Baulier ("Baulier '604"). Claims 9-16 and 28-35 stand rejected as being obvious over Gilchrist in view of U.S. Patent No. 6,708,422 to Blonder ("Blonder"). Claims 46-51 stand rejected as being obvious in view of Gilchrist and Baulier '707 and further in view of U.S. Patent No. 6,466,918 to Spiegel ("Spiegel"). For reasons set forth more fully below, these rejections are respectfully traversed as to all pending claims in the application.

Amended Independent Claims 1, 20 and 39 Patentably Define Over Gilchrist, Baulier and Klatt

Independent claims 1, 20 and 39 have been amended to incorporate subject matter from herewith-cancelled claims 3, 22 and 41. Claims 3, 22 and 41 were rejected under 35 U.S.C. 103(a) as being unpatentable over Gilchrist-Baulier and further in view of U.S. Patent No. 6,415,277 to Klatt et al. ("Klatt").

As acknowledged in the Office Action, Gilchrist-Baulier does not teach storing of business rules in a database identified by a company. The Office Action therefore relied on Klatt in rejecting these claims. The Office Action states that Klatt teaches "retrieving business rules from a database identified by company, and performing those actions" and offers that it would have been obvious to combine the rules database of Klatt with the rule evaluation of Gilchrist-Baulier to obtain a central authentication system implementing multiple policies for separate companies. Applicants respectfully disagree.

Klatt is directed to a system for extracting information in a corporate database for generating print production orders (col. 3, lines 29-32). Klatt provides event rules that generate an action in response to a business-related event such as addition of an employee, changes in inventory, and so on (col. 5, lines 9-12). Klatt teaches methods by which requisitions can be automatically created with necessary information included to place an order for printed materials (See, for example, col. 6, lines 44-58). In simple terms, Klatt provides rules that can be used to automatically initiate certain actions triggered by events in a corporation. Klatt speaks explicitly of *event rules* used to generate a *print order or requisition* and provides no teaching of business

rules that can be used to determine the need for authentication of a request from a user to use on-line services.

Nor does Klatt teach storing rules for a plurality of companies having on-line resources as recited in the claims. As described above, Klatt is directed to a system for creating requisitions and print orders within a single corporation. Klatt does not envisage an authentication service that stores rules for other companies.

Accordingly, Applicants respectfully submit that the rejections based on an alleged combination of Gilchrist and Beaulier with Klatt cannot be reasonably sustained in light of the absence of explicit teachings in Klatt of storing business rules for a plurality of companies having on-line resources and using the stored business rules associated with an identified company in determining the necessity of authenticating a user seeking use of an associated on-line resource, as recited in the claims of the present application.

For at least these reasons, amended independent Claims 1, 20 and 39 patentably define over Gilchrist, Baulier and Klatt and Applicants respectfully request withdrawal of the rejections of these claims, along with pending claims 2, 4-8, 10-16, 18, 19, 21, 23-27, 29-35, 37, 38, 40, 43 and 45-51 that depend therefrom.

Dependent Claims 4 and 23 Further Patentably Define Over the Cited Prior Art

Considering also claims 4 and 23, Klatt cannot be reasonably said to disclose, teach or render obvious the nature of the recited business rules, even if, through hindsight it could be believed that Klatt's teachings are sufficiently elastic and expansive to allow a teaching of *a single corporation's event rules for triggering print orders* to encompass "storing authentication rules for a plurality of companies having on-line resources." Specifically, claims 4 and 23 and 41 require a determination of whether "the user is listed by the company as always requiring authentication." Thus, a logical reading of the claims 4 and 23 and 41 yields rules that are typically created independently of the authentication service because a determination of the status of the user with the company providing the on-line service is required.

For at least these additional reasons, the rejections of claims 4 and 23 should be withdrawn.

No Other Cited References Cure The Deficiencies Cited Above

Claims 7, 8, 9-16, 26, 27, 28-35, 42, 43 and 46-51 stand rejected as being obvious over Gilchrist in view of Baulier '604, Blonder, Baulier '707 and/or Spiegel. These claims depend ultimately from amended independent claims 1, 20 and 39 and thus are patentable for at least the reasons presented above. The deficiencies noted above are not cured by the alleged combination with Baulier '604, Blonder and/or Spiegel. Accordingly, the rejections of these claims should be withdrawn.

Conclusion

All objections and rejections having been addressed, and in view of the foregoing, the claims are believed to be in form for allowance, and such action is hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

Respectfully submitted,
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